

but must make use of Ameritech's routing tables. This common transport, priced on a per minute basis or per customer line basis, will only be available for the transport of local calls. It is reasonable to apply an overflow charge when dedicated transport overflows onto common transport.

3. Customized routing functions must be offered without a bona fide request (BFR) process. Ameritech's March 26, 1997, tariff filing complies with this requirement. Pricing is presumed appropriate at this time although further review may be necessary upon refiling of the statement.

4. Vertical switch features, including those not currently offered by Ameritech must be made generally available without a BFR process. The Commission will accept Ameritech's March 26, 1997, tariff filing as meeting the intent of this requirement. Ameritech must provide lists of the features for each switch, the status of the feature, and available information on the applicable right-to-use fees. Pricing is presumed appropriate at this time although further review may be necessary upon refiling of the Statement.

5. Ameritech shall allow collocation of RSMs of a capacity suited to market entry. Reasonable limits on collocated RSM capacity will be allowed in the tariffs, where such limits will not constrain market entry, are supportable by space, power or CO environmental limitations, and allow a reasonable accommodation of market share growth.

6. Ameritech and CLECs must be able to compete in providing access services to toll providers. Access revenues will accrue to the provider of access services. Ameritech must lift its prohibition of CLECs completing toll calls transported over the CLEC's access network to line cards serving Ameritech's or other CLECs' customers. For those calls,

the CLECs should pay only unbundled local switching, plus the applicable monthly charges for transport services. The Commission rejects the alternative proposal that access revenue accrue to whomever provides the line card to the customer.

7. Costs associated with usage development and implementation should be reflected in the associated unbundled rate elements and not reflected as a separate charge.

vii. Nondiscriminatory Access to 9-1-1, Directory Assistance, and Operator Services

1. *Ameritech's terms, conditions, and/or charges must be adjusted so that new entrants' 9-1-1 service costs can be recovered in a manner not disadvantageous to new entrant companies.*

The Commission accepts the March 3, 1997, Statement and associated tariff as meeting the intent of this requirement.

viii. White Pages Listings

1. *No adjustment is required on this issue in the first order.*

2. *Ameritech must revise its offering to competitors to include availability of additional listings, customer services information pages, foreign directories, additional directories, and other services at a rate no more than cost plus a reasonable markup.*

This requirement is not necessary to ensure compliance with the 14-point competitive checklist of the Act. The Commission is limiting its consideration in the area of white pages listings to meeting the requirements of the 14-point competitive checklist of the Act and not imposing a state requirement in this area of questionable state Commission authority. Accordingly, the Commission eliminates this requirement.

Chairman Parrino dissented.

3. *Each Ameritech directory must include the listings for all competitors in exchanges for which it lists the incumbent's customers, including EAS and ECC customers, when listed.*

Ameritech's March 3, 1997, Statement complies with this requirement.

ix. Nondiscriminatory Access to Telephone Numbers

1. *No adjustment is required on this issue in the first order.*

x. Nondiscriminatory Access to Databases and Signaling for Call Routing

1. *Ameritech must state, in its tariffs, that denial of a bona fide request due to technical infeasibility may be referred to the Commission.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *Ameritech must provide to its competitors the same level of assistance with LERG entries that it provides to small LECs.*

Ameritech's March 3, 1997, Statement complies with this requirement.

xi. Interim Number Portability

1. *No adjustment is required on this issue in the first order.*

2. *Ameritech's offering must be revised to state Ameritech will accumulate records of its long-run economic costs to be recovered when a cost recovery mechanism is developed.*

Ameritech's March 3, 1997, Statement complies with this requirement.

xii. Access to Services and Information to Implement Local Dialing Parity

1. *No adjustment is required on this issue in the first order.*

xiii. Reciprocal Compensation Arrangements

Addressed elsewhere.

xiv. Telecommunications Services Available for Resale.

1. *Ameritech must revise its resale rates using the best available data and using the costing methods and financial adjustments described in the Findings of Fact of the Commission's first order in this docket.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *The discount must be applied uniformly to all services in a family unless an exception is granted. Exceptions must be supported by a showing that the ratio of LRSIC costs which are avoided to the total LRSIC costs for the service is significantly different than the average of LRSIC costs which are avoided to average total LRSIC costs for all services, or some verifiable systematic method to assure variations are reasonable*

Ameritech's March 3, 1997, Statement complies with this requirement. .

3. (a) *Ameritech shall modify its tariff to allow resellers to aggregate usage for the purpose of applying volume discounts. Residential volume usage discounts will be applied on a per end-user customer basis.*

Ameritech's March 3, 1997, Statement complies with this requirement.

3. (b) *Ameritech must reduce the charges for all nonrecurring costs to no greater than cost plus a reasonable markup.*

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Information supplied by Ameritech demonstrates that its nonrecurring charges bear a reasonable relationship to underlying costs.

4. (a) *All terms and conditions of resale must be included in tariffs, including operations system support and performance benchmarks.*

Ameritech's March 3, 1997, Statement complies with this requirement.

4. (b) *Ameritech's tariff must provide that copies of performance and parity reports will be provided to customers of unbundled and wholesale services as a condition of service, unless waived by the customer.*

Ameritech's March 3, 1997, Statement complies with this tariff requirement. The format and content of these reports is still not finalized, however, finalization may not be necessary for approval of the Statement.

The Commission adds one specific requirement regarding performance and parity reporting: To meet the needs of the parties to assess parity without disadvantaging Ameritech Communications Inc. (ACI), the report for ACI should be provided to each recipient of a report. For this report, competitively sensitive actual results may be converted to relative figures for comparison, such as percentages or another substitute appropriate for the performance measure shown. However the ACI information is shown, the report recipient should see its own results, those for Ameritech, and for all non-Ameritech customers, in the same substitute format in addition to the actual results format.

5. *Ameritech's offering must be revised to include discounted prices for resold grandparented and sunsetted services.*

Ameritech's March 3, 1997, Statement complies with this requirement.

6. *Ameritech's offering must be revised to allow unlimited transfers of grandparented and sunsetted services to new providers, so long as the customers remain otherwise eligible for the offering.*

Ameritech's March 3, 1997, Statement complies with this requirement.

7. *Ameritech is not allowed to revise its Statement to exempt from discount its promotions, discounts and non-standard offerings of greater than 90 days.*

No action is required.

8. *Ameritech's offering must be revised to make clear all telecommunications services offered via individual contracts are to be available for resale at discounted prices*

Ameritech's March 3, 1997, Statement complies with this requirement. .

9. *Ameritech's offering must be revised to state that notice of a new service will be provided to purchasers of resold services when each roll-out schedule for a new service has been set.*

In its initial filing, Ameritech had proposed that competitors get notice of new services when the tariffs for those new services are filed. Parties objected, arguing that they should have the same amount of time to prepare marketing strategies for new services that Ameritech marketing people had. The Commission staff proposed that Ameritech notify competitors at the same time it set a roll-out schedule. Ameritech countered with a proposal to provide a 60-day notification. The competitors were given opportunity to object to the 60-day proposal, and none

TAB F-95
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did. Therefore, the Commission finds the 60-day notification period reasonable and Ameritech's March 3, 1997, Statement in compliance.

General

2. It is reasonable to require Ameritech to submit, at least 14 days prior to filing another statement, information satisfying all the requirements listed in Appendix B.

3. Tariffs submitted for the purpose of compliance with orders in this docket have been placed on file although not all tariffs are found in compliance for approval of a Statement. Required tariff revisions are given in the preceding findings of fact. It is reasonable to require Ameritech to submit to the Commission its proposed tariff revisions no less than 14 days prior to filing another Statement.

CONCLUSION OF LAW

THE COMMISSION CONCLUDES:

It has jurisdiction under ss. 133.01, 133.07(2), 196.01, 196.02, 196.03, 196.04, 196.06, 196.07, 196.08, 196.19, 196.195, 196.20, 196.203, 196.204, 196.219, 196.22, 196.25, 196.26, 196.28, 196.37, 196.39, 196.395, 196.40, 196.499, 196.50, 196.58, 196.60(1), 196.65, Stats., other provisions of chs. 196 and 227, Stats., that may be pertinent thereto, and under authority granted the Commission under § 252 and § 271 of the Telecommunications Act of 1996 (the Act), and other provisions of the Act that may be pertinent hereto, to make findings of fact as discussed above, to interpret statutes, to specify information to be supplied before filing the next statement, and to accept, reject, refrain from acting upon and/or make modification to the Statement submitted by Ameritech for approval by this Commission.

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ORDER

THE COMMISSION ORDERS:

1. This order is effective on issuance.
2. Ameritech's Statement is rejected.
3. No less than 14 days prior to filing another Statement, Ameritech must submit to the Commission all the items listed in Appendix B.
4. Some tariffs filed in association with the March 3, 1997, statement require revision or further review. Those tariffs are identified in the preceding findings of ultimate fact and must be submitted for revision no less than 14 days prior to filing another Statement.
5. The Commission retains jurisdiction.

Dated at Madison, Wisconsin, _____

By the Commission:

Lynda L. Dorr
Secretary to the Commission

LLD:JJR:lep:g:\digorder\pending\6720ti1202nd

See attached Notice of Appeal Rights

TAB F-97

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in s. 227.53, Stats. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in s. 227.01(3), Stats., a person aggrieved by the order has the further right to file one petition for rehearing as provided in s. 227.49, Stats. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with s. 227.48(2), Stats., and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 4/22/91

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P.02/02

From: Dept. of Public Service To: SCOTT MCMAHON

Date: 5/13/97 Time: 08:57:58

PAGE 2 OF 2

→ Rocky, Doug
Pat, Jonel

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

Internet Address: <http://www.dps.state.ny.us>

PUBLIC SERVICE COMMISSION

JOHN F. O'MARA
Chairman
EUGENE W. ZELTMANN
Deputy Chairman
THOMAS J. DUNLEAVY



MAUREEN O. HELMER
General Counsel
JOHN C. CRARY
Secretary

May 13, 1997

BY TELEFAX

To All Active Parties

RE: CASE 97-C-0271 - Petition of New York Telephone Company for Approval of its Statement of Generally Available Terms and Conditions (\$252) and Draft Filing of Petition for InterLATA Entry (\$271).

The purpose of this letter is to inform parties of the process adopted in this case in light of the May 1, 1997 meeting of advisory staff and New York Telephone Company (New York Telephone), and the New York Telephone letter of May 9, 1997.

Following consideration of the record of the Technical Conference, the parties' briefs and reply briefs, and the informal discussions between parties and advisory staff, I plan soon to issue preliminary conclusions as to the completeness of the record concerning New York Telephone's petition for approval of its Statement of Generally Available Terms (Statement) and compliance with the checklist.

Because of shortcomings in this record, a recommendation to the Commission to approve the Statement is not feasible. Rather than report to the Commission at this time, I will be informing the parties of the status of the record and affording them a limited opportunity to augment it as to specific issues. Parties will be asked to review and comment on any supplements to the record. In my view, this procedure is the most consonant with the Telecommunications Act of 1996 (the Act) and will best facilitate the identification and rectification of any failures to provision commercially reasonable interconnection and access to competitive local exchange carriers, in particular as there is no barrier in the Act to an incumbent local exchange carrier resubmitting a \$252 petition or a \$271 application following a decision adverse to it in whole or in part.

Eleanor Stein
Administrative Law Judge

TAB G-1

MAY 13 '97 08:58

DAH

PAGE.02

**NEW YORK STATE
PUBLIC SERVICE COMMISSION**

In the Matter of:

Petition of New York Telephone Company
for Approval of its Statement of Generally
Available Terms and Conditions (§ 252)
and Draft Filing of Petition for InterLATA
Entry (§ 271)

Case No. 97-C-0271

**AFFIDAVIT OF MICHAEL L. WAJSGRAS
ON BEHALF OF LCI INTERNATIONAL TELECOM CORPORATION**

I, Michael L. Wajsgras, being first duly sworn upon oath, do hereby depose
and state:

1. I have been employed by LCI International Telecom Corporation
("LCI") since November, 1994. My job title is Senior Manager, Local Service.

2. I hold an undergraduate degree in accounting and a masters degree in
business administration, both of which I received from the University of Maryland.
Before joining LCI, I was employed for three years by MCI (1991-1994) in its
Consumer Markets Division.

3. As Senior Manager, Local Service, I am responsible for the day-to-day
operations of LCI's resale local exchange service business, including the
supervision of the sales and operations staff in every state in which LCI is currently
doing retail business, including New York.

TAB G2-1

Background of LCI And Its Entry Into Local Exchange Service

4. LCI started in business in 1983 as a regional interexchange carrier offering telephone service in Ohio and Michigan. LCI has grown to become the sixth largest long distance carrier, and now offers long distance services nationwide.

5. Following passage of the Telecommunications Act, I participated in developing LCI's business plan for entry into local exchange service. The first phase of that business plan calls for LCI to enter as a reseller in selected geographic markets in which LCI has an established long distance customer base. which LCI believes is the most efficient and economical way to develop market penetration and experience in the local exchange service market.

6. LCI has begun implementation of the first phase of its business plan, and is now a reseller of local exchange service in several states, including New York.

LCI's Resale Business in New York

7. LCI commenced its resale operations in New York in November of 1996. Currently LCI's resale business has a geographic focus in LATA 132, exchanges 212 and 718, and a market focus on small businesses with two to 20 lines. LCI has plans to begin reselling residential service during 1997.

8. Currently, LCI has over 400 resale business customers in New York.

Purpose Of Affidavit

9. The FCC recognized in an August 8, 1996 Order that nondiscriminatory access to an ILEC's operations support systems ("OSS") is essential to the development of competition in the local exchange service market. The purpose of my affidavit is to describe for the Commission the problems that LCI has experienced with the OSS of Nynex in connection with LCI's efforts to sell and

TAB G-2-2

provision its local service in New York. These problems demonstrate that LCI's access to OSS is not at parity with the access afforded Nynex' own retail operations. Consequently, LCI cannot provide the same quality and level of service to its customers and potential customers as can Nynex, and LCI's ability to compete in the local exchange market in New York is, therefore, impaired.

10. The major recurring problems that LCI has experienced with Nynex' OSS can be grouped into the following four categories. These categories are:

- **Limited and discriminatory access to the OSS;**
- **Discrimination in OSS response times;**
- **Delays in the provisioning of service; and**
- **Delays in providing billing information.**

Each of these is discussed below.

Limited And Discriminatory OSS Access

11. To interface with Nynex' OSS, LCI uses what Nynex refers to as its Web-Based Graphical User Interface ("WEB/GUI"). The WEB/GUI is not a complete electronic interface, and it limits in significant ways LCI's ability to access and efficiently manipulate important information in the OSS.

12. For example, to perform pre-ordering functions, LCI needs access to customer service records ("CSRs") to determine, among other things, the type of service and number of lines serving the customer to whom LCI is attempting to sell its service. LCI cannot currently obtain electronic access through the WEB/GUI interface to individual CSR records that are longer than 50 pages. More importantly, for those CSRs that LCI can access electronically, LCI cannot save or store these records electronically into its own database, nor is it able to search through these records electronically to capture the USOC codes, which would enable LCI to determine instantaneously the type of service currently being

TAB G2-3

provided by Nynex to the customer at issue. Instead, LCI is forced to print these records, and then review them individually, one page at a time, to obtain the desired information. This is an inefficient and time-consuming process, and a burden on LCI's resale efforts. I do not believe that Nynex' retail operations face these same limitations in accessing CSRs.

13. Another limitation is that only one user can access a customer's records at any given time. This impairs LCI's quality control because we cannot have a supervisor monitor in real time the work of our order entry and customer service personnel. Moreover, LCI's customer service personnel cannot timely respond to customer inquiries regarding their account if the customer's records are, at the time of the inquiry, open at another terminal. These limitations, which I do not believe are experienced by Nynex' own retail operations, prevent LCI from providing a quality of service to its customers and potential customers that is equal to the service which Nynex can provide.

14. LCI also cannot access or view customer service orders as entered by Nynex. When LCI submits a service order to Nynex, a Nynex service representative manually enters the data into the OSS. This increases the opportunity for errors, and LCI cannot thereafter electronically access the service order to determine its accuracy. In contrast, Nynex' own service orders are entered electronically the first time, and I believe they can be immediately reviewed for accuracy.

15. LCI also cannot access information about the status of installation orders. This is significant because, as discussed below, Nynex has frequently missed due dates for provisioning service. Nynex does not provide notice to LCI if the due date is in jeopardy, nor does Nynex notify LCI when the due date has been missed. When the customer calls to complain, LCI cannot electronically access the status of the order to determine why it was missed. I do not believe that Nynex'

TAB 62-4

retail operation faces these same limitations, and consequently can provide better service to its customers and potential customers than can LCI.

Delays In OSS Response Times

16. Nynex has also not provided LCI with parity in terms of the time it takes LCI to obtain a response from the OSS. I am informed and believe that when Nynex' retail operations access and query the OSS on any type of transaction, whether it be retrieving CSRs, determining feature availability, assigning numbers, pricing orders, or submitting repair requests, the OSS responds almost instantly. In contrast, the response time to LCI typically exceeds one minute (or more), which means that LCI is not being provided equal access, and cannot provide the same prompt service to its customers and potential customers that Nynex can.

17. LCI is also at a disadvantage when it comes to service order handling. LCI's service orders generally do not get processed by the OSS for several hours; it sometimes takes as long as a day, occasionally even longer. In contrast, I believe Nynex' own retail orders get processed quickly, if not instantly. This results in LCI's customers having their service installed or repaired at a later date than customers of Nynex who place their orders at the same time.

Delays In Provisioning Of Service

18. The most persistent problem that LCI has experienced with Nynex' OSS has been missed due date commitments for the provisioning of service. On at least 32% of the orders that LCI has initiated between February 1 and March 18, 1997, the due date that was given by Nynex to LCI's customers has not been met. (I believe that this number is considerably higher, but LCI has not yet reviewed all of its customer order records to compile this data.) The details on the missed due dates that LCI has been able to compile thus far are set forth in Exhibit A to this affidavit.

TAB 02-5

As the Commission can see, the delay in provisioning of orders has ranged anywhere from one day to one week or more, with an average delay of 4.8 days.

19. Nynex' failure to meet these due date commitments on a substantial number of LCI's orders is particularly damaging to LCI's ability to compete effectively as a new entrant. LCI had received numerous complaints from its potential new customers; several of its customers have been billed by both LCI and Nynex for the same period, because Nynex did not notify LCI that the due date was missed; and LCI is aware of at least two customers who decided to keep their service with Nynex after LCI was unable to provide service on the promised date.

20. While LCI does not have access to the data that would show how frequently due date commitments are missed for Nynex' own retail customers, I believe that such comparative data would show that LCI and its customers are not receiving service that is at parity with the service provided to Nynex' own retail customers.

Delays In Providing Billing Information

21. As a reseller of local service, LCI must obtain all necessary call record information from Nynex in order to bill LCI end-user customers for the calls they make. This call record information is captured electronically by Nynex switches at the time the call passes through the switch. It is Nynex' obligation to timely and accurately transmit this information to LCI so that LCI can, in turn, bill its end-user customers.

22. Nynex has persistently failed to provide LCI with call record information on a timely basis. Nynex could and should be providing this information to LCI within 24 to 36 hours after a call has been recorded at the switch. That is the time at which LCI generally provides long distance call record information to its own reseller customers.

23. Attached as Exhibit B is a chart prepared from LCI's call record system which shows the distribution of call record information received by Nynex since December of 1996. This chart shows that on over 40% of the calls made by LCI

TAB G2-6

customers, Nynex does not transmit the call record data until three days or more after the call was made.

24. Despite repeated requests to Nynex, Nynex has been unwilling to more quickly provide this call record information to LCI. Nynex' refusal to do so is having and will continue to have an adverse impact on LCI's business operations and on its ability to grow and compete effectively as a local service provider in New York. The adverse impact upon LCI's business includes:

- Untimely call record information results in billing delays: A number of the customers whom LCI has persuaded to leave Nynex are already long distance customers of LCI. These customers expect and want to receive one bill from LCI that incorporates all of the local and long distance calls made by the customer during that billing cycle. LCI typically has all of the information necessary to invoice its long distance service within one or two days following the close of the billing cycle. Because of Nynex' failure to timely transmit local service call record data, LCI has been forced to delay sending its invoices by five days.
- Billing delays caused by untimely call record information affects LCI's cash flow: When LCI is forced to delay sending invoices, this affects LCI's cash flow because it typically means LCI is paid later than it should have received payment. While the dollar amount of the current delayed invoices is not substantial given that LCI is a new entrant in New York, the amount is anticipated to become significant if LCI meets its projections for growth in its local service business.
- Untimely call record information results in local calls being billed out of cycle: Even though LCI has delayed invoicing its customers in order to capture in the appropriate billing cycle as many local service calls as it

TAB G2-7

can, LCI has been and will continue to be forced to back-bill a number of local calls due to Nynex' failure to timely provide call record information.

- Delayed invoicing and back-billing causes LCI to lose revenue and creates confusion and uncertainty in the minds of LCI's customers: LCI anticipates that some of its customers will not pay for phone calls that are billed out-of-cycle because those customers cannot, in turn, bill those calls to their customers. All of these billing irregularities, caused in the first instance by Nynex' failure to timely provide call record data, adversely impact not only LCI's revenue and cash flow, but LCI's credibility with its customer base. This, in turn, impacts LCI's ability to compete with Nynex for local service business.

Conclusion

25. The problems I have described in this affidavit are ones that have been repeatedly raised by LCI with Nynex representatives, and have yet to be resolved. I am attaching hereto as Exhibit C true and correct copies of representative correspondence from LCI representatives to Nynex in which these (and other) problems have been raised.

26. The discriminatory treatment described in this affidavit prevents LCI from providing service to its customers and potential customers that is equal in quality, availability, timeliness, and reliability to the service that Nynex is able to provide to its own retail customers. LCI has been and will continue to be impaired in its ability to compete against Nynex in the local services market until these problems are eliminated and until LCI truly has nondiscriminatory access to the critical functions of Nynex' OSS.

TAB G2-8

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge, information and belief.



Michael L. Wajsgras

On this 12 day of Nov, 1997, before me personally came Michael L. Wajsgras, to me known who, being duly sworn, did depose and say that he is the individual described in this Affidavit.

On this 12 day of Nov, 1997,



NOTARY PUBLIC

My commission expires:

TAB G2-9

TAB G-2-10

EXHIBIT A

Missed Due Dates

Account#	Due Date	Switched Date	Days Late
30-350428	2/3/97	3/19/97	44
30-351284	2/4/97	3/4/97	18
30-358844	2/22/97	3/14/97	20
30-359166	2/23/97	3/5/97	10
30-359148	2/23/97	3/6/97	11
30-359156	2/23/97	3/3/97	8
30-359167	2/23/97	3/3/97	8
30-359835	2/27/97	3/11/97	12
30-359703	2/27/97	3/3/97	4
30-359950	2/28/97	3/12/97	12
30-360297	3/1/97	3/12/97	11
30-360878	3/5/97	3/10/97	5
30-360856	3/5/97	3/7/97	2
30-361140	3/6/97	3/13/97	7
30-360756	3/6/97	3/7/97	1
30-360875	3/7/97	3/10/97	3
30-360877	3/7/97	3/10/97	3
30-360880	3/7/97	3/10/97	3
30-360881	3/7/97	3/10/97	3
30-360757	3/7/97	3/17/97	10
30-360755	3/7/97	3/10/97	3
30-360874	3/7/97	3/11/97	4
30-360863	3/7/97	3/12/97	5
30-360888	3/8/97	3/10/97	2
30-360694	3/10/97	3/13/97	3
30-360882	3/10/97	3/11/97	1
30-360890	3/10/97	3/11/97	1
30-361334	3/10/97	3/13/97	3
30-361385	3/10/97	3/18/97	8
30-361344	3/10/97	3/13/97	3
30-361408	3/10/97	3/14/97	4
30-361358	3/10/97	3/13/97	3
30-361366	3/10/97	3/19/97	9
30-361147	3/11/97	3/14/97	3
30-361133	3/11/97	3/17/97	6
30-361156	3/11/97	3/12/97	1
30-361144	3/11/97	3/12/97	1
30-361146	3/11/97	3/17/97	6
30-362385	3/11/97	3/14/97	3
30-361419	3/11/97	3/13/97	2
30-361422	3/11/97	3/13/97	2
30-361426	3/11/97	3/14/97	3
30-361363	3/11/97	3/12/97	1
30-361428	3/11/97	3/13/97	2

TAB 62-11

Missed Due Dates

30-361173	3/11/97	3/12/97	1
30-361142	3/12/97	3/13/97	1
30-360859	3/12/97	3/17/97	5
30-361157	3/12/97	3/13/97	1
30-361338	3/12/97	3/13/97	1
30-361340	3/12/97	3/13/97	1
30-361342	3/12/97	3/13/97	1
30-361348	3/12/97	3/13/97	1
30-361352	3/12/97	3/13/97	1
30-361357	3/12/97	3/13/97	1
30-361359	3/12/97	3/13/97	1
30-361360	3/12/97	3/13/97	1
30-361362	3/12/97	3/13/97	1
30-361367	3/12/97	3/13/97	1
30-362693	3/13/97	3/14/97	1
30-361335	3/13/97	3/14/97	1
30-361350	3/13/97	3/18/97	5
30-361347	3/13/97	3/20/97	7
30-361356	3/13/97	3/14/97	1
30-362513	3/13/97	3/14/97	1
30-362662	3/14/97	3/18/97	4
30-362666	3/14/97	3/18/97	4
30-363399	3/17/97	3/25/97	8
30-255249	3/17/97	3/25/97	8

Average # of Days Late

4 882352941

Identified Missed due dates between 2/1/97 and 3/18/97: 68

Approximate Number of Orders Provisioned between 2/1/97 and 3/18/97 215

% of Identified as Missed Due Dates: 32%

TAB G-2-12

TAB G-2-13
EXHIBIT B

**DISTRIBUTION OF CALL RECORD
DATA RECEIVED FROM NYNEX SINCE
DECEMBER 1996**

NUMBER OF DAYS PAST DATE OF CALL	PERCENTAGE OF CALLS
1	25.32
2	26.20
3	11.37
4	14.32
5	3.69
6	6.66
7	6.17
8	1.79
9	1.20
10	0.15

TAB-G2-14